

Exhibit 1



Notice of Service of Process

Transmittal Number: 31761216
Date Processed: 07/03/2025

Primary Contact: Thomas Campuzano
United Airlines Holdings, Inc.
233 S Wacker Dr
Fl 11
Chicago, IL 60606-7147

Electronic copy provided to: Maria Bustamante

Entity:	United Airlines Holdings, Inc. Entity ID Number 0220042
Entity Served:	United Airlines Holdings, Inc.
Title of Action:	Joseph Landicho vs. United Airlines Holdings, Inc.
Matter Name/ID:	Joseph Landicho vs. United Airlines Holdings, Inc. (17556326)
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Loudoun County Circuit Court, VA
Case/Reference No:	CL 25-4163
Jurisdiction Served:	Virginia
Date Served on CSC:	07/02/2025
Answer or Appearance Due:	21 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	The Simms Firm PLC 703-383-0636

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COMMONWEALTH OF VIRGINIA



LOUDOUN CIRCUIT COURT
Civil Division
18 E MARKET ST/PO BOX 550
LEESBURG VA 20178-0550
(703) 777-0270

Summons

To: UNITED AIRLINES HOLDINGS INC
BY PRIVATE PROCESS SERVER
SERVE CORP. SERVICE COMPANY
100 SHOCKOE SLIP FLOOR 2
RICHMOND VA 23219

Case No. 107CL25004163-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Monday, June 30, 2025

Clerk of Court: GARY M CLEMENS

by

Vannie Weaver

(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: SIMMS, JONATHAN A
703-225-3300
11325 RANDOM HILLS RD. STE 360
FAIRFAX VA 22030

VIRGINIA:

IN THE CIRCUIT COURT FOR LOUDOUN COUNTY

JOSEPH LANDICHO,
Plaintiff,

v.

UNITED AIRLINES HOLDINGS, INC,
UNITED AIRLINES, INC.,, d/b/a
UNITED AIRLINES,
Defendants
233 S. Wacker Drive
Chicago, IL 60606

SERVE: Corporation Service Company
100 Shockoe Slip
Floor 2
Richmond, VA 23219

CASE NO: CL 25 - 4163

JURY TRIAL DEMANDED

COMPLAINT

FILED
2025 JUN 25 P 3:2
CIRCUIT COURT
CLERKS OFFICE
LOUDOUN COUNTY, VA
TESTE: D.D.

COMES NOW the Plaintiff, Joseph Landicho, by and through counsel, and brings this action against Defendant United Airlines Holdings, Inc.(hereinafter United Airlines), pursuant to state law, seeking redress for injuries occurring due to negligent acts. Plaintiff seeks compensatory damages, punitive damages, as well as attorney's fees and costs. In support of this claim, Plaintiff states as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff, Joseph Landicho, is an adult individual and resident of Gilbertsville, Pennsylvania.
2. Defendant, United Airlines, Inc., is a corporation licensed to do business in Virginia, with its principal place of business at 233 S. Wacker Drive, Chicago, IL 60606, and registered agent in Virginia located at 100 Shockoe Slip, Floor 2, Richmond, VA 23219, and regularly

conducts substantial business in Loudoun County, Virginia, including at the international terminal of Washington Dulles International Airport.

3. Venue is appropriate in the County of Loudoun pursuant to Virginia Code 8.01-262(4), as the cause of action arose in the County of Loudoun. Specifically the incident occurred at the Dulles International Airport located in Loudoun County, Virginia.

4. At all times relevant herein, Defendant operated and managed the flight at issue and employed the staff tasks with assisting the Plaintiff in boarding the aircraft and getting into his assigned seat on the aircraft.

FACTS

5. On June 30, 2023, Plaintiff, a fare-paying passenger, was scheduled to board a United Airlines flight to Munich at Dulles International Airport. According to Plaintiff's United Airlines ticket, the flight number was UA108 and was a direct flight departing at 5:30pm (Eastern Standard Time).

6. On or about June 30, 2023, the subject flight was conducted on an aircraft owned, leased, operated, staffed, or otherwise controlled by Defendant United Airlines.

7. On or about June 30, 2023, Defendant United Airlines was responsible for the training, management, supervision, and/or control of the employees tasks with assisting passengers with boarding, including but not limited to the adherence to standard safety policies and protocol.

8. Plaintiff is a wheel chair bound paraplegic. As such, he required assistance from United Airline employees to board the aircraft and get to his assigned seat which was 15A in business class on the subject flight.

9. On or about June 30, 2023, two employees of United Airlines (“United Staff”), acting within the scope of their employment and as agents of United Airlines, were responsible for assisting Plaintiff onto the subject aircraft and into his assigned seat.

10. On or about June 30, 2023, during the Plaintiff’s boarding, the United Staff handled Plaintiff over aggressively, roughly and negligently, failing to exercise the care expected of airline employees assisting a passenger with a disability.

11. The United Staff’s negligent handling included improper support, rough physical handling, and failure to follow proper safety procedures for assisting a disabled passenger. As a direct result of their negligent conduct, Plaintiff suffered a severe injury—specifically, a fractured ankle.

12. Plaintiff’s injury was caused by the careless and negligent actions of the United Staff, acting as agents of United Airlines within the scope of their employment, in their handling of Plaintiff.

COUNT I: NEGLIGENCE

13. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

14. On or about June 30, 2023, Defendant owed a duty to Plaintiff, a passenger, to exercise reasonable care in handling, assisting, and boarding him onto the aircraft, including proper support and safe handling procedures.

15. The United Staff, acting within the scope of their employment and as agents of Defendant, breached this duty by negligently handling Plaintiff, acting recklessly, and failing to follow proper safety protocols.

16. The negligence of Defendant's agents (United Staff) was a direct and proximate cause of Plaintiff's injuries, including but not limited to a fractured ankle.

17. The Defendant is vicariously liable under the doctrine of *respondeat superior* for the negligent acts and injuries caused by their employees which include United Staff whom negligently handled Plaintiff causing his injuries.

18. As a result of Defendant's negligence, Plaintiff has suffered damages, including medical expenses, pain and suffering, emotional distress, and other compensable damages.

19. Plaintiff is entitled to recover damages in an amount to be proven at trial, but in any event, not less than Five Hundred Thousand Dollars (\$500,000.00).

DAMAGES

20. Plaintiff has incurred and will incur medical expenses, pain and suffering, emotional distress, loss of enjoyment of life, loss of earnings, mental anguish, and other damages as a result of the injury.

21. Plaintiff seeks damages in the amount of Five Hundred Thousand Dollars (\$500,000.00).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment against Defendant United Airlines, as follows:

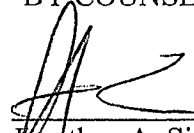
A. For Count I awarding compensatory and punitive damages in the amount of Five Hundred Thousand Dollars (\$500,000.00);

B. Awarding costs of this action, including attorney's fees;

C. Granting such other and further relief as the Court deems just and proper.

JURY TRIAL DEMANDED ON ALL ISSUES

Respectfully submitted,
JOSEPH LANDICHO
BY COUNSEL


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